



**U.S. Department of Justice**

***Michael J. Sullivan***  
*United States Attorney*  
*District of Massachusetts*

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*1 Courthouse Way*  
*Suite 9200*  
*Boston, Massachusetts 02210*

January 6, 2006

Hon. Marianne B. Bowler  
United States Magistrate Judge  
United States District Court  
District of Massachusetts

Re: United States v. Burdley Jean et al. Criminal No. 05-10110-MLW

Dear Judge Bowler:

Please be aware that pursuant to Local Rule 116.6 (A), the government declines to provide with its automatic discovery full details of the Giglio material relevant to the witnesses the government intends to use in its case in chief, including the names of those witnesses. The government believes that it would be detrimental to the interests of justice to make such disclosure at this time. Several of the witnesses have expressed concern for their safety and a fear of some of the defendants. Given the large number of defendants in this case, seven of whom are not in custody, there exists a significant possibility that one or more of the defendants may seek to harm or interfere with these witnesses.

The government intends to provide this information 21 days before trial, or at such other time as the Court orders.

Very truly yours,

**MICHAEL J. SULLIVAN**  
United States Attorney

By: /s/ Seth P. Berman  
**SETH P. BERMAN**  
Assistant U.S. Attorney

cc: Defense Counsels (by electronic notice)